

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON,)	
)	
Plaintiff,)	Case No. 2:25-cv-00043-CB
)	
v.)	Judge Cathy Bissoon
)	
ALLEN MARKETING GROUP, INC.,)	
)	
Defendant.)	
)	

**MOTION OF ATTORNEYS LISA A. MESSNER AND JO BENNETT FOR LEAVE TO
WITHDRAW FROM REPRESENTATION OF ALLEN MARKETING GROUP, INC.**

Now come Attorneys Lisa A. Messner and Jo Bennett, and pursuant to Local Civil Rule 83.2(C)(4), move for leave to withdraw from representation of Defendant Allen Marketing Group, Inc. The reason that counsel seeks to withdraw from representing Defendant is due to a lack of communication with the client such that a breakdown in the attorney-client relationship has occurred.

More specifically, the sole contact for communication between counsel and the Defendant company was with its principal, Terry Allen. Despite repeated efforts to contact Mr. Allen by various means of communication to discuss the defense of the company in connection with this matter, counsel has received no responsive communications from Mr. Allen since April 10, 2025. Counsel has also been unable to receive responsive communications with any other employee of the Defendant company.

Given these circumstances, undersigned counsel is not able to effectively represent Defendant. The lack of communication is also the reason that counsel cannot identify who would

be the succeeding attorney or obtain the signature of the Defendant (or an authorized agent) on this Motion.

The last known address for Defendant is 164 West Center Street, Cedar City Utah 84720 and the last known telephone number is 435-233-2200. The company's registered agent is Corporation Service Company, 15 West South Temple, Suite 1701, Salt Lake City, Utah 84101.

Respectfully submitted,

/s/ Lisa A. Messner

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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Motion was served via U.S. Mail on Defendant at its address of 164 West Center Street, Cedar City Utah 84720 and the company's registered agent of Corporation Service Company at 15 West South Temple, Suite 1701, Salt Lake City, Utah 84101 on this 2nd day of June, 2025.

/s/ Lisa A. Messner
Lisa A. Messner